

EXHIBIT 3

DOCKET NO. FST-CV-09-5011591-S : SUPERIOR COURT
RESIDENTIAL FUNDING CO., LLC : J.D. OF STAMFORD/NORWALK
v. : AT STAMFORD
THOMAS J. LA CASSE : SEPTEMBER 24, 2014

**MOTION FOR EXTENSION OF TIME TO RESPOND
TO INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Pursuant to Practice Book Sections 13-7(a)(3), 13-10(a)(3), and 13-23(a), the plaintiff in the above-captioned matter hereby moves for an Order granting an extension of forty-five (45) days in which to respond to the defendant, Thomas J. La Casse's First Request for Interrogatories and First Request for Production, until and including November 10, 2014. As grounds in support of this motion, the plaintiff states as follows:

1. On July 28, 2014, the defendant served extensive interrogatories and requests for production. The plaintiff filed a timely request for an automatic extension of time to respond to the discovery requests, and responses are currently due on September 26, 2014, no objection to the request having been filed.

NO ORAL ARGUMENT OR TESTIMONY REQUESTED.

2. New counsel was retained to represent the plaintiff in this action in conjunction with a change in the servicer for the underlying mortgage loan. On August 19, 2014, undersigned counsel appeared in this action in lieu of the plaintiff's prior counsel.

3. The plaintiff, by and through its undersigned counsel, intends to file a motion to substitute the party-plaintiff as necessary to proceed with the instant foreclosure action. Undersigned counsel anticipates that the motion may be filed within the next thirty (30) days.

4. Additional time is necessary for undersigned counsel to obtain the documents and information necessary to prepare and file a motion to substitute the party-plaintiff and to fully and accurately complete objections, written responses and document production in response to the defendant's discovery requests on behalf of the proposed substitute party-plaintiff.

5. No party will be prejudiced by allowance of this motion. There are no pending issues of fact as the defendant withdrew his motion to dismiss and has not yet filed a responsive pleading, and as it would be inefficient for the defendant to file a responsive pleading before the party-plaintiff is substituted. See Docket generally and specifically at Entry Nos. 133.00 and 173.00.

6. On or about September 23, 2014, the plaintiff's undersigned counsel left a message for the defendant's counsel requesting that he contact her to discuss this case. On September 24, 2013, the plaintiff's undersigned counsel emailed the defendant's counsel, asking

if the defendant would consent to the extension of time requested in this motion and requesting the Word version of the defendant's discovery requests as they are lengthy and did not leave much room to respond. As of the filing of this motion, there has been no response.

7. The plaintiff, by and through its counsel, hereby certifies that the above-captioned matter has not been assigned for trial.

WHEREFORE, the plaintiff moves for an Order granting an extension of forty-five (45) days in which to respond to the defendant's First Request for Interrogatories and First Request for Production, until and including November 10, 2014.

Plaintiff,

By its attorneys,

/s/ Valerie N. Doble

Marissa I. Delinks, Jury No. 434580

Valerie N. Doble, Juris No. 425760

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v. : **AT STAMFORD**
THOMAS J. LA CASSE :

ORDER

The foregoing motion having been heard, it is hereby ordered: GRANTED / DENIED.

BY THE COURT,

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Motion for Extension of Time to Respond to Interrogatories and Requests for Production* has been mailed this 25th day of September, 2014 to:

Donald M. Brown, Esq. Law Offices of Donald M. Brown, Esq. 32 Pine Tree Lane Avon, CT 06001 Thomas La Casse 100 Cambridge Street Boston, MA 02114	Kenny & Sams, PC 134 Turnpike road Southborough, MA 01772
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/s/ Valerie N. Doble

Valerie N. Doble